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NETFLIX, INC.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

**STATUS REPORT ON THIRD-PARTY
DISCOVERY**

Judge: Hon. Jon S. Tigar

STATUS REPORT ON THIRD-PARTY DISCOVERY

Pursuant to this Honorable Court's Order, ECF No. 293, Netflix, Inc. ("Netflix") provides the Court with the following update regarding the third-party discovery Netflix seeks

from AiPi, LLC (“AiPi”) in the Eastern District of Virginia. On January 24, 2025, the Honorable Leonie M. Brinkema held a hearing on Netflix’s Motion for Civil Contempt for failure to comply with Judge Brinkema’s previous order directing AiPi to comply with Netflix’s subpoena. *See* Ex. A (Jan. 24, 2025, Hr’g Tr.). In ordering full and complete compliance with the subpoena, which sought documents and testimony, Judge Brinkema also directed AiPi to participate in a multi-step forensic discovery process. *See* Ex. B (Jan. 27, 2025, Order). The forensic discovery process has begun. Netflix expects a production of responsive material by the end of February, for any privilege disputes to be litigated before Judge Brinkema in early March, and oral testimony to be given in late March.

Dated: February 18, 2025

BAKER BOTTS, LLP

/s/ Rachael D. Lamkin

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